

**UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
AUSTIN DIVISION**

**FREEDOM FROM RELIGION
FOUNDATION, INC.**
Plaintiff,

-VS-

GOVERNOR GREG ABBOTT, in his official and individual capacities, and ROD WELSH, Executive Director of the Texas State Preservation Board, in his official and individual capacities, Defendants.

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**CASE NO. 1:16-CV-00233-SS**

## DECLARATION OF DANIEL H. BYRNE

1. My name is Daniel H. Byrne. I have personal knowledge of all the facts herein, and they are all true and correct. This declaration is submitted in connection with Plaintiff's Motion for Attorney's Fees (the "Motion") filed in the above-styled litigation, seeking recovery of fees from Defendants Greg Abbott and Rod Welsh (the "Defendants").

2. I am an attorney duly licensed to practice law in the State of Texas and have been continuously since 1983. I am a senior partner with the law firm Fritz, Byrne, Head & Gilstrap, PLLC ("FBHG"), which represents Plaintiff Freedom From Religion Foundation, Inc. ("FFRF") in this case. A large portion of my practice has been devoted to litigation of matters such as this in state and federal court.

### A. TIME AND LABOR REQUIRED

3. FBHG's attorneys and paralegals spent approximately 52 hours performing necessary legal services for FFRF to prosecute its freedom of speech claims under the First

Amendment (the “Free Speech Claims”) in this lawsuit, for a total cost of legal services valued at \$22,037 measured by the lodestar method: hours spent at standard hourly rates.

4. These fees incurred prosecuting the Free Speech Claims were inextricably intertwined with the remainder of FFRF’s claims against the Defendants in that they arose from the same facts (the censorship of FFRF’s Bill of Rights exhibit) and were based on related legal theories (the Defendants’ discrimination against FFRF’s nontheistic viewpoint).

5. The FBHG fees sought in the Motion are shown in the summary and detailed invoices (with privileged matters redacted) attached hereto as **Exhibits A-1 and A-2**. As reflected therein, these services included researching and analyzing the legal bases for claims asserted by FFRF; drafting, reviewing and revising pleadings, motions and responses; attending hearings; participating in client and attorney meetings regarding strategy and implications of claims asserted; conducting discovery; research; and preparing the request for fees with which this declaration is being submitted. Care was taken to avoid duplication of efforts with lead counsel, and in our role as local counsel to perform services in a manner which minimized the overall cost to the client for its legal services.

**B. NOVELTY AND DIFFICULTY OF THE QUESTIONS PRESENTED/SKILL REQUIRED TO PROPERLY PERFORM LEGAL SERVICES.**

6. The legal questions presented related to FFRF’s claims are not particularly novel for attorneys with experience in this area, and they were of moderate difficulty. However, the complexity of the case and level of effort necessary to prosecute FFRF’s claims was increased by the multiplicity of defenses and dispositive motions pursued by the Defendants. A moderate degree of skill was required, and the requisite skill is reflected in the reasonable billing rates charged by FFRF’s attorneys and paralegals.

**C. PRECLUSION OF OTHER EMPLOYMENT**

7. FFRF's attorneys were not precluded from taking on additional cases due to the pendency of this litigation.

**D. THE CUSTOMARY FEE**

8. I am familiar with rates charged by attorneys in the Western District of Texas for matters such as this. My billing rate is currently \$550 per hour, and that rate has increased from the \$525 hourly rate that I charged at the inception of this action in 2016. In addition to me, the firm personnel who have primarily provided legal services on this case include my partner, Lessie Gilstrap, whose billing rate is currently \$395, per hour, and my partner Dale L. Roberts whose billing rate for this case was \$335 per hour. *See Exh. A-2*. In my opinion, these rates and all the rates charged to FFRF by FBHG and by the other attorneys who rendered legal services on behalf of FFRF submitted herewith (which are in the same range as those rates charged by FBHG's attorneys) are reasonable for the services rendered in this matter as compared with fees customarily charged in the Western District of Texas for similar legal services, taking into account the reputation, experience, and skills of the professionals involved.

**E. WHETHER THE FEE IS FIXED OR CONTINGENT**

9. The fee arrangement between FBHG and FFRF is an hourly fee arrangement.

**F. TIME LIMITATIONS IMPOSED BY THE CLIENT**

10. The client imposed no particularly difficult time limitations in this case.

**G. AMOUNT INVOLVED AND RESULTS OBTAINED**

11. FFRF sought and obtained summary judgment against Defendants on its First Amendment Freedom of Speech claim against Governor Abbott and Executive Director Walsh in their official capacities as well as a declaratory judgment that Defendants violated FFRF's First

Amendment rights and engagement in viewpoint discrimination as a matter of law when FFRF's Bill of Rights exhibit was removed from the Texas Capitol Building. In my opinion, the tasks described on **Exhibit A-2** were all reasonable and necessary to obtain that relief.

**H. EXPERTISE, REPUTATION AND ABILITY OF ATTORNEYS**

12. I have over 30 years of experience litigating matters similar to this in state and federal courts. My law partners Lessie C. Gilstrap and Dale L. Roberts each have over 17 years of state and federal court experience. We all have reputations in the Austin legal community as highly competent litigators.

**I. UNDESIRABILITY OF THE CASE**

13. This factor is inapplicable as there were no particular considerations rendering this case undesirable.

**J. NATURE AND LENGTH OF THE PROFESSIONAL RELATIONSHIP WITH THE CLIENT**

14. FFRF has been a client of FBHG since 2016 when it sought counsel in this case.

**K. APPLICATION OF THE LODESTAR METHOD**

15. The fees requested herein were calculated by multiplying the number of hours spent by each attorney or paralegal performing necessary legal services on behalf of FFRF by each person's standard billing rates, which in my opinion are reasonable in the Western District of Texas, Austin Division. It is my experience that attorneys in this legal community that perform similar work on similar cases have higher, and often significantly higher, billing rates. The requested fees would not have been incurred if it were not for the Defendants' violations of FFRF's Civil Rights.

16. In my opinion, taking into account the relevant factors identified by the Texas Supreme Court and the Fifth Circuit, an award of \$22,037 against the Defendants for FBHG's past

attorneys' fees would be equitable in the circumstances and represents a reasonable sum for the services provided (as described in the attached Exhibits).

I, Daniel H. Byrne, do hereby declare under penalty of perjury that the foregoing is true and correct.

SIGNED this 3rd day of July, 2018.

A handwritten signature in black ink, appearing to read 'Daniel Byrne', is written over a horizontal line.

Daniel Byrne

|    | A                             | B                         | C                        |
|----|-------------------------------|---------------------------|--------------------------|
| 1  | <b>EXHIBIT A-1</b>            |                           |                          |
| 2  |                               |                           |                          |
| 3  | <b><u>Month Bill Sent</u></b> | <b><u>Total Hours</u></b> | <b><u>Total Fees</u></b> |
| 4  | March 2016                    | 4.3                       | \$ 2,030.00              |
| 5  | April 2016                    | 0.8                       | \$ 420.00                |
| 6  | May 2016                      | 7.9                       | \$ 2,685.00              |
| 7  | June 2016                     | 2.1                       | \$ 962.50                |
| 8  | July 2016                     | 1.8                       | \$ 1,752.00              |
| 9  | Jan 2017                      | 0.7                       | \$ 315.00                |
| 10 | Feb 2017                      | 1.3                       | \$ 612.50                |
| 11 | March 2017                    | 1.1                       | \$ 577.50                |
| 12 | May 2017                      | 13.2                      | \$ 4,923.00              |
| 13 | June 2017                     | 2.3                       | \$ 1,207.50              |
| 14 | Aug 2017                      | 0.4                       | \$ 150.00                |
| 15 | Nov 2017                      | 1.3                       | \$ 682.50                |
| 16 | March 2018                    | 0.2                       | \$ 105.00                |
| 17 | June 2018                     | 0.8                       | \$ 440.00                |
| 18 | July 2018                     | 13.5                      | \$ 5,394.50              |
| 19 | <b>TOTAL</b>                  | <b>51.7</b>               | <b>\$ 22,257.00</b>      |

**EXHIBIT A-2****Fritz, Byrne, Head & Fitzpatrick, PLLC**

221 West Sixth Street, Suite 960  
 Austin, TX 78701  
 Phone 512/476-2020 Fax 512/477-5267  
 www.fbhf.com

March 15, 2016

Freedom From Religion Foundation  
 c/o Richard L. Bolton  
 Boardman & Clark, LLP  
 1 S. Pinckney Street, Suite 410  
 P.O. Box 927  
 Madison, WI 53701-0927

Invoice# 106478 DHB  
 Our file# 062640 00001  
 Billing through 02/29/2016

Governor Greg Abbott

rbolton@boardmanclark.com

PROFESSIONAL SERVICES

|          |     |                                                                                                                                                          |          |                  |
|----------|-----|----------------------------------------------------------------------------------------------------------------------------------------------------------|----------|------------------|
| 02/17/16 | LGF | Communications with Mr. Bolton;                                                                                                                          | 0.20 hrs | 70.00            |
| 02/19/16 | DHB | Conference with LGF, investigation re:<br>[REDACTED] prepare for and attend status and<br>strategy call with Richard Bolton re: [REDACTED]<br>[REDACTED] | 0.70 hrs | 367.50           |
| 02/19/16 | LGF | Call with Robert Bolton;                                                                                                                                 | 0.50 hrs | 175.00           |
| 02/22/16 | DHB | Initial review of draft complaint, discuss [REDACTED]<br>with LGF;                                                                                       | 0.50 hrs | 262.50           |
| 02/22/16 | LGF | Review draft petition;                                                                                                                                   | 0.30 hrs | 105.00           |
| 02/23/16 | DHB | Review, revise complaint, civil cover sheet,<br>engagement letter; memo to co-counsel;                                                                   | 0.40 hrs | 210.00           |
| 02/24/16 | DHB | Review final draft of suit papers, pro hac vice<br>motion, other materials; follow up memos;                                                             | 0.30 hrs | 157.50           |
| 02/24/16 | LGF | Review proposed filings; communications with<br>Mr. Bolton;                                                                                              | 0.30 hrs | 105.00           |
| 02/25/16 | DHB | Review, revise, finalize, file complaint; follow up<br>memos with co-counsel;                                                                            | 0.70 hrs | 367.50           |
| 02/26/16 | DHB | Various memos to counsel, third parties re: [REDACTED]<br>[REDACTED] memos re:<br>[REDACTED]                                                             | 0.40 hrs | 210.00           |
|          |     |                                                                                                                                                          |          | <hr/> \$2,030.00 |

FEE RECAP

|            |          |            |          |
|------------|----------|------------|----------|
| Byrne, Dan | 3.00 hrs | 525.00 /hr | 1,575.00 |
|------------|----------|------------|----------|

062640 Freedom From Religion Foundati

Invoice# 106478 Page 2

|                            |          |            |                   |
|----------------------------|----------|------------|-------------------|
| Fitzpatrick, Lessie G.     | 1.30 hrs | 350.00 /hr | 455.00            |
| TOTAL FEES FOR THIS MATTER |          |            | <u>\$2,030.00</u> |

EXPENSES

|            |                                                                                                        |                 |
|------------|--------------------------------------------------------------------------------------------------------|-----------------|
| 02/29/2016 | Fee paid to Direct Results Legal Service re: service of summons and complaint on Governor Gregg Abbott | 145.50          |
|            |                                                                                                        | <u>\$145.50</u> |

BILLING SUMMARY

|                                       |                          |
|---------------------------------------|--------------------------|
| Total professional services           | \$2,030.00               |
| Total expenses incurred               | \$145.50                 |
| Total of new charges for this invoice | <u>\$2,175.50</u>        |
| <b>Total balance now due</b>          | <b><u>\$2,175.50</u></b> |

Payment due upon receipt. EIN: 742531698  
Include invoice number on your check for proper credit.



**Fritz, Byrne, Head & Fitzpatrick, PLLC**

221 West Sixth Street, Suite 960  
 Austin, TX 78701  
 Phone 512/476-2020 Fax 512/477-5267  
 www.fbhf.com

April 14, 2016

Freedom From Religion Foundation  
 c/o Richard L. Bolton  
 Boardman & Clark, LLP  
 1 S. Pinckney Street, Suite 410  
 P.O. Box 927  
 Madison, WI 53701-0927

Invoice# 106672 DHB  
 Our file# 062640 00001  
 Billing through 03/31/2016

Governor Greg Abbott

rbolton@boardmanclark.com

|                                                    |               |
|----------------------------------------------------|---------------|
| Balance forward as of invoice dated March 15, 2016 | \$2,175.50    |
| Payments received since last invoice               | 2,175.50      |
| Accounts receivable balance carried forward        | <u>\$0.00</u> |

PROFESSIONAL SERVICES

|          |     |                                |          |                 |
|----------|-----|--------------------------------|----------|-----------------|
| 03/01/16 | DHB | Memo re: [REDACTED]            | 0.20 hrs | 105.00          |
| 03/04/16 | DHB | Various memos re: [REDACTED]   | 0.40 hrs | 210.00          |
| 03/06/16 | DHB | Memo to counsel re: [REDACTED] | 0.20 hrs | 105.00          |
|          |     |                                |          | <u>\$420.00</u> |

FEE RECAP

|                            |          |            |                 |
|----------------------------|----------|------------|-----------------|
| Byrne, Dan                 | 0.80 hrs | 525.00 /hr | 420.00          |
| TOTAL FEES FOR THIS MATTER |          |            | <u>\$420.00</u> |

EXPENSES

|            |                               |                 |
|------------|-------------------------------|-----------------|
| 02/25/2016 | Filing fee on 02/25/16 (USDC) | 400.00          |
|            |                               | <u>\$400.00</u> |

BILLING SUMMARY

|                             |          |
|-----------------------------|----------|
| Total professional services | \$420.00 |
| Total expenses incurred     | \$400.00 |

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Invoice# 106672 Page 2

Total of new charges for this invoice

\$820.00

**Total balance now due**

**\$820.00**

Payment due upon receipt. EIN: 742531698

Include invoice number on your check for proper credit.

**Fritz, Byrne, Head & Fitzpatrick, PLLC**

221 West Sixth Street, Suite 960  
 Austin, TX 78701  
 Phone 512/476-2020 Fax 512/477-5267  
 www.fbhf.com

May 10, 2016

Freedom From Religion Foundation  
 c/o Richard L. Bolton  
 Boardman & Clark, LLP  
 1 S. Pinckney Street, Suite 410  
 P.O. Box 927  
 Madison, WI 53701-0927

Invoice# 106842 DHB  
 Our file# 062640 00001  
 Billing through 04/30/2016

Governor Greg Abbott

rbolton@boardmanclark.com

|                                                    |               |
|----------------------------------------------------|---------------|
| Balance forward as of invoice dated April 14, 2016 | \$820.00      |
| Payments received since last invoice               | 820.00        |
| Accounts receivable balance carried forward        | <u>\$0.00</u> |

PROFESSIONAL SERVICES

|          |     |                                                                                                          |          |        |
|----------|-----|----------------------------------------------------------------------------------------------------------|----------|--------|
| 04/01/16 | DHB | Initial review, transmittal of MTD;                                                                      | 0.30 hrs | 157.50 |
| 04/02/16 | DHB | Initial review and analysis of MTD;                                                                      | 0.20 hrs | 105.00 |
| 04/04/16 | DHB | Review MTD, memos to counsel re: [REDACTED]                                                              | 0.40 hrs | 210.00 |
| 04/04/16 | LGF | Review motion to dismiss; correspondence with Richard Bolton regarding [REDACTED]                        | 0.40 hrs | 140.00 |
| 04/05/16 | DHB | Memo to opposing counsel re: [REDACTED] revise, finalize motion to extend; conference with KMH:          | 0.70 hrs | 367.50 |
| 04/05/16 | KMH | Review federal rules and prepare motion and order for extension of time to respond to motion to dismiss; | 1.80 hrs | 270.00 |
| 04/05/16 | KMH | Prepare motion for extension of time;                                                                    | 1.00 hrs | 150.00 |
| 04/06/16 | KMH | Assist with court filing;                                                                                | 0.40 hrs | 60.00  |
| 04/08/16 | LGF | Review order on motion for continuance and calendar new deadline;                                        | 0.20 hrs | 70.00  |
| 04/25/16 | DHB | Memos re: [REDACTED]                                                                                     | 0.20 hrs | 105.00 |
| 04/26/16 | DHB | Various memos re: [REDACTED]                                                                             | 0.30 hrs | 157.50 |

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Invoice# 106842 Page 2

|          |     |                                                                                        |          |                  |
|----------|-----|----------------------------------------------------------------------------------------|----------|------------------|
| 04/26/16 | LGF | Communications regarding [REDACTED]<br>[REDACTED] draft motion for leave to<br>amend;  | 0.70 hrs | 245.00           |
| 04/27/16 | DHB | Review motion; memos re: [REDACTED]                                                    | 0.20 hrs | 105.00           |
| 04/27/16 | LGF | Communications regarding [REDACTED]<br>[REDACTED]                                      | 0.20 hrs | 70.00            |
| 04/28/16 | DHB | Initial review of amended complaint, motion for<br>leave;                              | 0.30 hrs | 157.50           |
| 04/29/16 | DHB | Review, finalize, file amended complaint and<br>notice for leave; memos to co-counsel; | 0.60 hrs | 315.00           |
|          |     |                                                                                        |          | <hr/> \$2,685.00 |

FEE RECAP

|                            |          |            |                  |
|----------------------------|----------|------------|------------------|
| Byrne, Dan                 | 3.20 hrs | 525.00 /hr | 1,680.00         |
| Fitzpatrick, Lessie G.     | 1.50 hrs | 350.00 /hr | 525.00           |
| Hand, Kathy M.             | 3.20 hrs | 150.00 /hr | 480.00           |
| TOTAL FEES FOR THIS MATTER |          |            | <hr/> \$2,685.00 |

BILLING SUMMARY

|                                       |                               |
|---------------------------------------|-------------------------------|
| Total professional services           | \$2,685.00                    |
| Total of new charges for this invoice | <hr/> \$2,685.00              |
| <b>Total balance now due</b>          | <hr/> <b>\$2,685.00</b> <hr/> |

Payment due upon receipt. EIN: 742531698  
Include invoice number on your check for proper credit.

**Fritz, Byrne, Head & Fitzpatrick, PLLC**

221 West Sixth Street, Suite 960  
 Austin, TX 78701  
 Phone 512/476-2020 Fax 512/477-5267  
 www.fbhf.com

June 15, 2016

Freedom From Religion Foundation  
 c/o Richard L. Bolton  
 Boardman & Clark, LLP  
 1 S. Pinckney Street, Suite 410  
 P.O. Box 927  
 Madison, WI 53701-0927

Invoice# 107087 DHB  
 Our file# 062640 00001  
 Billing through 05/31/2016

Governor Greg Abbott

rbolton@boardmanclark.com

|                                                  |               |
|--------------------------------------------------|---------------|
| Balance forward as of invoice dated May 10, 2016 | \$2,685.00    |
| Payments received since last invoice             | 2,685.00      |
| Accounts receivable balance carried forward      | <u>\$0.00</u> |

PROFESSIONAL SERVICES

|          |     |                                              |          |                 |
|----------|-----|----------------------------------------------|----------|-----------------|
| 05/10/16 | DHB | Memo re: [REDACTED]                          | 0.20 hrs | 105.00          |
| 05/10/16 | LGF | Review scheduling order; calendar deadlines; | 0.20 hrs | 70.00           |
| 05/13/16 | DHB | Initial review of motion to dismiss;         | 0.20 hrs | 105.00          |
| 05/13/16 | LGF | Review First Amended Motion to Dismiss;      | 0.20 hrs | 70.00           |
| 05/24/16 | DHB | Memo to counsel re: [REDACTED]               | 0.20 hrs | 105.00          |
| 05/27/16 | DHB | Various memos re: [REDACTED]                 | 0.40 hrs | 210.00          |
| 05/27/16 | LGF | Communications with Richard Bolton;          | 0.20 hrs | 70.00           |
| 05/31/16 | DHB | Various memos re: [REDACTED]                 | 0.30 hrs | 157.50          |
| 05/31/16 | LGF | Communications regarding [REDACTED]          | 0.20 hrs | 70.00           |
|          |     |                                              |          | <u>\$962.50</u> |

FEE RECAP

|                            |          |            |                 |
|----------------------------|----------|------------|-----------------|
| Byrne, Dan                 | 1.30 hrs | 525.00 /hr | 682.50          |
| Fitzpatrick, Lessie G.     | 0.80 hrs | 350.00 /hr | 280.00          |
| TOTAL FEES FOR THIS MATTER |          |            | <u>\$962.50</u> |

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Invoice# 107224 Page 2

|                            |          |            |                   |
|----------------------------|----------|------------|-------------------|
| Fitzpatrick, Lessie G.     | 0.20 hrs | 350.00 /hr | 70.00             |
| Roberts, Dale              | 2.20 hrs | 335.00 /hr | 737.00            |
| TOTAL FEES FOR THIS MATTER |          |            | <u>\$1,752.00</u> |

BILLING SUMMARY

|                                       |                          |
|---------------------------------------|--------------------------|
| Total professional services           | <u>\$1,752.00</u>        |
| Total of new charges for this invoice | <u>\$1,752.00</u>        |
| Total balance now due                 | <u><u>\$1,752.00</u></u> |

Payment due upon receipt. EIN: 742531698  
Include invoice number on your check for proper credit.

**Fritz, Byrne, Head & Fitzpatrick, PLLC**

221 West Sixth Street, Suite 960  
 Austin, TX 78701  
 Phone 512/476-2020 Fax 512/477-5267  
 www.fbhf.com

July 6, 2016

Freedom From Religion Foundation  
 c/o Richard L. Bolton  
 Boardman & Clark, LLP  
 1 S. Pinckney Street, Suite 410  
 P.O. Box 927  
 Madison, WI 53701-0927

Invoice# 107224 DHB  
 Our file# 062640 00001  
 Billing through 06/30/2016

Governor Greg Abbott

rbolton@boardmanclark.com

|                                                   |               |
|---------------------------------------------------|---------------|
| Balance forward as of invoice dated June 15, 2016 | \$962.50      |
| Payments received since last invoice              | 962.50        |
| Accounts receivable balance carried forward       | <u>\$0.00</u> |

PROFESSIONAL SERVICES

|          |     |                                                                                                                                                                                     |          |                   |
|----------|-----|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------|-------------------|
| 06/13/16 | DHB | Various memos re: [REDACTED]                                                                                                                                                        | 0.50 hrs | 262.50            |
| 06/14/16 | DHB | Memo to Richard re: [REDACTED]                                                                                                                                                      | 0.20 hrs | 105.00            |
| 06/16/16 | DHB | Memos re: [REDACTED]                                                                                                                                                                | 0.20 hrs | 105.00            |
| 06/19/16 | DHB | Conference with DLR re: [REDACTED]                                                                                                                                                  | 0.20 hrs | 105.00            |
| 06/20/16 | DHB | Meeting with Richard Bolton re: [REDACTED]<br>[REDACTED] conference with DLR<br>re: [REDACTED] (8);                                                                                 | 0.50 hrs | 262.50            |
| 06/20/16 | DLR | Review pleadings and motions. Conference with<br>co-counsel regarding [REDACTED] Attend<br>hearing on motion to dismiss. Email memo to L<br>Fitzpatrick regarding [REDACTED] (3.2). | 2.20 hrs | 737.00            |
| 06/20/16 | LGF | Communications with DLR regarding [REDACTED]                                                                                                                                        | 0.20 hrs | 70.00             |
| 06/21/16 | DHB | Review dismissal order, follow up;                                                                                                                                                  | 0.20 hrs | 105.00            |
|          |     |                                                                                                                                                                                     |          | <u>\$1,752.00</u> |

FEE RECAP

|            |          |            |        |
|------------|----------|------------|--------|
| Byrne, Dan | 1.80 hrs | 525.00 /hr | 945.00 |
|------------|----------|------------|--------|

062640 Freedom From Religion Foundati

Invoice# 107087 Page 2

BILLING SUMMARY

|                                       |                        |
|---------------------------------------|------------------------|
| Total professional services           | \$962.50               |
| Total of new charges for this invoice | <u>\$962.50</u>        |
| <b>Total balance now due</b>          | <b><u>\$962.50</u></b> |

Payment due upon receipt. EIN: 742531698

Include invoice number on your check for proper credit.



**Fritz, Byrne, Head & Gilstrap, PLLC**

221 West Sixth Street, Suite 960  
 Austin, TX 78701  
 Phone 512/476-2020 Fax 512/477-5267  
 www.fbhg.law

January 18, 2017

Freedom From Religion Foundation  
 c/o Richard L. Bolton  
 Boardman & Clark, LLP  
 1 S. Pinckney Street, Suite 410  
 P.O. Box 927  
 Madison, WI 53701-0927

Invoice# 108666 DHB  
 Our file# 062640 00001  
 Billing through 12/31/2016

Governor Greg Abbott

rbolton@boardmanclark.com

|                                                  |               |
|--------------------------------------------------|---------------|
| Balance forward as of invoice dated July 6, 2016 | \$1,752.00    |
| Payments received since last invoice             | 1,752.00      |
| Accounts receivable balance carried forward      | <u>\$0.00</u> |

PROFESSIONAL SERVICES

|          |     |                                                                 |          |                 |
|----------|-----|-----------------------------------------------------------------|----------|-----------------|
| 07/01/16 | DHB | Initial review of outgoing discovery, memo to opposing counsel; | 0.20 hrs | 105.00          |
| 12/20/16 | LCG | Review order on MSJs;                                           | 0.30 hrs | 105.00          |
| 12/21/16 | DHB | Review decision, memos to counsel re: [REDACTED]                | 0.20 hrs | 105.00          |
|          |     |                                                                 |          | <u>\$315.00</u> |

FEE RECAP

|                            |          |            |                 |
|----------------------------|----------|------------|-----------------|
| Byrne, Dan                 | 0.40 hrs | 525.00 /hr | 210.00          |
| Gilstrap, Lessie C.        | 0.30 hrs | 350.00 /hr | 105.00          |
| TOTAL FEES FOR THIS MATTER |          |            | <u>\$315.00</u> |

BILLING SUMMARY

|                                       |                        |
|---------------------------------------|------------------------|
| Total professional services           | <u>\$315.00</u>        |
| Total of new charges for this invoice | <u>\$315.00</u>        |
| Total balance now due                 | <u><u>\$315.00</u></u> |

Payment due upon receipt. EIN: 742531698

062640 Freedom From Religion Foundati

Invoice# 108666 Page 2

Include invoice number on your check for proper credit.

**Fritz, Byrne, Head & Gilstrap, PLLC**

221 West Sixth Street, Suite 960  
 Austin, TX 78701  
 Phone 512/476-2020 Fax 512/477-5267  
 www.fbhg.law

February 15, 2017

Freedom From Religion Foundation  
 c/o Richard L. Bolton  
 Boardman & Clark, LLP  
 1 S. Pinckney Street, Suite 410  
 P.O. Box 927  
 Madison, WI 53701-0927

Invoice# 108898 DHB  
 Our file# 062640 00001  
 Billing through 01/31/2017

Governor Greg Abbott

rbolton@boardmanclark.com

|                                                      |               |
|------------------------------------------------------|---------------|
| Balance forward as of invoice dated January 18, 2017 | \$315.00      |
| Payments received since last invoice                 | 315.00        |
| Accounts receivable balance carried forward          | <u>\$0.00</u> |

PROFESSIONAL SERVICES

|          |     |                                                             |          |                 |
|----------|-----|-------------------------------------------------------------|----------|-----------------|
| 01/02/17 | LCG | Review scheduling order and calendar deadlines;             | 0.20 hrs | 70.00           |
| 01/03/17 | DHB | Memos re: [REDACTED]                                        | 0.20 hrs | 105.00          |
| 01/03/17 | LCG | Review scheduling order; confer re [REDACTED]               | 0.20 hrs | 70.00           |
| 01/19/17 | DHB | Various memos to counsel re: [REDACTED]                     | 0.30 hrs | 157.50          |
| 01/20/17 | DHB | Telephone conferences with, memos to counsel re: [REDACTED] | 0.20 hrs | 105.00          |
| 01/25/17 | DHB | Memos to counsel re: [REDACTED]                             | 0.20 hrs | 105.00          |
|          |     |                                                             |          | <u>\$612.50</u> |

FEE RECAP

|                            |          |            |                 |
|----------------------------|----------|------------|-----------------|
| Byrne, Dan                 | 0.90 hrs | 525.00 /hr | 472.50          |
| Gilstrap, Lessie C.        | 0.40 hrs | 350.00 /hr | 140.00          |
| TOTAL FEES FOR THIS MATTER |          |            | <u>\$612.50</u> |

BILLING SUMMARY

|                             |          |
|-----------------------------|----------|
| Total professional services | \$612.50 |
|-----------------------------|----------|

062640 Freedom From Religion Foundati

Invoice# 108898 Page 2

Total of new charges for this invoice

\$612.50

**Total balance now due**

**\$612.50**

Payment due upon receipt. EIN: 742531698

Include invoice number on your check for proper credit.

**Fritz, Byrne, Head & Gilstrap, PLLC**

221 West Sixth Street, Suite 960  
 Austin, TX 78701  
 Phone 512/476-2020 Fax 512/477-5267  
 www.fbhg.law

March 14, 2017

Freedom From Religion Foundation  
 c/o Richard L. Bolton  
 Boardman & Clark, LLP  
 1 S. Pinckney Street, Suite 410  
 P.O. Box 927  
 Madison, WI 53701-0927

Invoice# 109091 DHB  
 Our file# 062640 00001  
 Billing through 02/28/2017

Governor Greg Abbott

rbolton@boardmanclark.com

|                                                       |               |
|-------------------------------------------------------|---------------|
| Balance forward as of invoice dated February 15, 2017 | \$612.50      |
| Payments received since last invoice                  | 612.50        |
| Accounts receivable balance carried forward           | <u>\$0.00</u> |

PROFESSIONAL SERVICES

|          |     |                                                                             |          |                 |
|----------|-----|-----------------------------------------------------------------------------|----------|-----------------|
| 02/07/17 | DHB | Telephone conferences, memos to co-counsel, opposing counsel re: [REDACTED] | 0.30 hrs | 157.50          |
| 02/15/17 | DHB | Memo to opposing counsel re: [REDACTED]                                     | 0.20 hrs | 105.00          |
| 02/17/17 | DHB | Memos re: [REDACTED]                                                        | 0.20 hrs | 105.00          |
| 02/26/17 | DHB | Memos re: [REDACTED]                                                        | 0.20 hrs | 105.00          |
| 02/27/17 | DHB | Memos re: [REDACTED]                                                        | 0.20 hrs | 105.00          |
|          |     |                                                                             |          | <u>\$577.50</u> |

FEE RECAP

|                                   |          |            |                        |
|-----------------------------------|----------|------------|------------------------|
| Byrne, Dan                        | 1.10 hrs | 525.00 /hr | 577.50                 |
| <b>TOTAL FEES FOR THIS MATTER</b> |          |            | <u><b>\$577.50</b></u> |

BILLING SUMMARY

|                                       |                        |
|---------------------------------------|------------------------|
| Total professional services           | <u>\$577.50</u>        |
| Total of new charges for this invoice | <u>\$577.50</u>        |
| <b>Total balance now due</b>          | <u><b>\$577.50</b></u> |

062640 Freedom From Religion Foundati

Invoice# 109091 Page 2

Payment due upon receipt. EIN: 742531698  
Include invoice number on your check for proper credit.

**Fritz, Byrne, Head & Gilstrap, PLLC**

221 West Sixth Street, Suite 960  
 Austin, TX 78701  
 Phone 512/476-2020 Fax 512/477-5267  
 www.fbhg.law

May 11, 2017

Freedom From Religion Foundation  
 c/o Richard L. Bolton  
 Boardman & Clark, LLP  
 1 S. Pinckney Street, Suite 410  
 P.O. Box 927  
 Madison, WI 53701-0927

Invoice# 109605 DHB  
 Our file# 062640 00001  
 Billing through 04/30/2017

Governor Greg Abbott

rbolton@boardmanclark.com

|                                                    |               |
|----------------------------------------------------|---------------|
| Balance forward as of invoice dated March 14, 2017 | \$577.50      |
| Payments received since last invoice               | 577.50        |
| Accounts receivable balance carried forward        | <u>\$0.00</u> |

PROFESSIONAL SERVICES

|          |     |                                                                                                                       |          |          |
|----------|-----|-----------------------------------------------------------------------------------------------------------------------|----------|----------|
| 03/27/17 | DHB | Initial review and analysis of witness lists other filings, depo lists; investigation re: [REDACTED] memo to counsel; | 0.30 hrs | 157.50   |
| 04/10/17 | DHB | Various memos re: [REDACTED] review [REDACTED]                                                                        | 0.50 hrs | 262.50   |
| 04/11/17 | DHB | Memos re: [REDACTED]                                                                                                  | 0.20 hrs | 105.00   |
| 04/13/17 | DHB | Memos re: [REDACTED]                                                                                                  | 0.20 hrs | 105.00   |
| 04/14/17 | DHB | Various memos re: [REDACTED]                                                                                          | 0.20 hrs | 105.00   |
| 04/17/17 | DHB | Initial review of motion for protective order;                                                                        | 0.20 hrs | 105.00   |
| 04/20/17 | DHB | Review MTQ, memo to Richard re: [REDACTED]                                                                            | 0.20 hrs | 105.00   |
| 04/21/17 | DHB | Review correspondence and filings re: [REDACTED]                                                                      | 0.20 hrs | 105.00   |
| 04/24/17 | CEB | Brief analysis of rule re: [REDACTED] conference with out of state counsel and D. Byrne re: [REDACTED]                | 0.20 hrs | 62.00    |
| 04/24/17 | DHB | Meetings with Richard Bolton, opposing counsel re: [REDACTED]                                                         | 2.30 hrs | 1,207.50 |

062640 Freedom From Religion Foundati

Invoice# 109605 Page 2

|          |     |                                                                                                                                                                                                                                  |          |                   |
|----------|-----|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------|-------------------|
|          |     | [REDACTED]                                                                                                                                                                                                                       |          |                   |
|          |     | (2.6);                                                                                                                                                                                                                           |          |                   |
| 04/24/17 | DLR | Prepare motions to extend time for response to motion for protective order and to extend scheduling order deadlines.                                                                                                             | 0.80 hrs | 268.00            |
| 04/24/17 | DAH | Draft order granting motion to extend time; file motion and order to extend time; telephone conference with clerk; revise motion and order to reflect corrected date; file corrected motion and order to extend time with court; | 0.70 hrs | 87.50             |
| 04/25/17 | DHB | Memos re: [REDACTED]                                                                                                                                                                                                             | 0.20 hrs | 105.00            |
| 04/26/17 | DHB | Various memos re: [REDACTED] review, revise draft, compile materials for DLR re: [REDACTED] memos to Richard; review discovery requests;                                                                                         | 0.80 hrs | 420.00            |
| 04/26/17 | DLR | Prepare opposed motion to extend scheduling order deadlines. Conference with DHB regarding same. Review history of discovery dispute regarding [REDACTED]                                                                        | 2.20 hrs | 737.00            |
| 04/27/17 | DHB | Review correspondence, further revisions to motion to extend;                                                                                                                                                                    | 0.30 hrs | 157.50            |
| 04/27/17 | DLR | Continued work on motion to extend scheduling order deadlines.                                                                                                                                                                   | 1.70 hrs | 569.50            |
| 04/28/17 | DHB | Various memos to Richard, opposing counsel re: 30b6, motion to extend; revise, finalize, file motions and subpoenas; initial review of new motion to dismiss;                                                                    | 0.80 hrs | 420.00            |
| 04/28/17 | DLR | Review topics of testimony for 30(b)(6) deposition. Prepare subpoena and finalize notice for service. Email to AG regarding subpoena and deposition.                                                                             | 0.90 hrs | 301.50            |
| 04/28/17 | DAH | Draft subpoena;                                                                                                                                                                                                                  | 0.30 hrs | 37.50             |
|          |     |                                                                                                                                                                                                                                  |          | <u>\$5,423.00</u> |

FEE RECAP

|                            |          |            |                   |
|----------------------------|----------|------------|-------------------|
| Byrne, Dan                 | 6.40 hrs | 525.00 /hr | 3,360.00          |
| Roberts, Dale              | 5.60 hrs | 335.00 /hr | 1,876.00          |
| Burgess, Christine         | 0.20 hrs | 310.00 /hr | 62.00             |
| Hammer, Dacia A            | 1.00 hrs | 125.00 /hr | 125.00            |
| TOTAL FEES FOR THIS MATTER |          |            | <u>\$5,423.00</u> |

BILLING SUMMARY

|                                |             |
|--------------------------------|-------------|
| Total professional services    | \$5,423.00  |
| Professional courtesy discount | \$500.00 CR |



062640 Freedom From Religion Foundati

Invoice# 109605 Page 3

Total of new charges for this invoice

\$4,923.00

**Total balance now due**

\$4,923.00

Payment due upon receipt. EIN: 742531698

Include invoice number on your check for proper credit.

**Fritz, Byrne, Head & Gilstrap, PLLC**

221 West Sixth Street, Suite 960  
 Austin, TX 78701  
 Phone 512/476-2020 Fax 512/477-5267  
 www.fbhg.law

June 15, 2017

Freedom From Religion Foundation  
 c/o Richard L. Bolton  
 Boardman & Clark, LLP  
 1 S. Pinckney Street, Suite 410  
 P.O. Box 927  
 Madison, WI 53701-0927

Invoice# 109811 DHB  
 Our file# 062640 00001  
 Billing through 05/31/2017

Governor Greg Abbott

rbolton@boardmanclark.com

|                                                  |                   |
|--------------------------------------------------|-------------------|
| Balance forward as of invoice dated May 11, 2017 | \$4,923.00        |
| Payments received since last invoice             | 0.00              |
| Accounts receivable balance carried forward      | <u>\$4,923.00</u> |

PROFESSIONAL SERVICES

|          |     |                                                                                                                                    |          |                   |
|----------|-----|------------------------------------------------------------------------------------------------------------------------------------|----------|-------------------|
| 05/01/17 | DHB | Review recent filing, memo re: [REDACTED]                                                                                          | 0.20 hrs | 105.00            |
| 05/02/17 | DHB | Memos re: [REDACTED]                                                                                                               | 0.20 hrs | 105.00            |
| 05/04/17 | DHB | Review Attorney General materials, memos to counsel re: [REDACTED]                                                                 | 0.30 hrs | 157.50            |
| 05/05/17 | DHB | Further review of motion to dismiss, response to motion to extend, other filings; telephone conference with Richard re: [REDACTED] | 0.60 hrs | 315.00            |
| 05/09/17 | DHB | Various memos to Richard, counsel re: [REDACTED]                                                                                   | 0.30 hrs | 157.50            |
| 05/15/17 | DHB | Review Sparks order, follow up with Rick Bolton;                                                                                   | 0.20 hrs | 105.00            |
| 05/22/17 | DHB | Memos re: [REDACTED] review Abbott reply brief;                                                                                    | 0.20 hrs | 105.00            |
| 05/25/17 | DHB | Review clawback notice:                                                                                                            | 0.20 hrs | N/C               |
| 05/26/17 | DHB | Various memos re: [REDACTED]                                                                                                       | 0.30 hrs | 157.50            |
|          |     |                                                                                                                                    |          | <u>\$1,207.50</u> |

FEE RECAP

|            |          |            |          |
|------------|----------|------------|----------|
| Byrne, Dan | 2.30 hrs | 525.00 /hr | 1,207.50 |
|------------|----------|------------|----------|

062640 Freedom From Religion Foundati

Invoice# 109811

Page 2

TOTAL FEES FOR THIS MATTER

\$1,207.50

BILLING SUMMARY

|                                       |                          |
|---------------------------------------|--------------------------|
| Total professional services           | <u>\$1,207.50</u>        |
| Total of new charges for this invoice | <u>\$1,207.50</u>        |
| Plus net balance forward              | <u>\$4,923.00</u>        |
| <b>Total balance now due</b>          | <b><u>\$6,130.50</u></b> |

Payment due upon receipt. EIN: 742531698

Include invoice number on your check for proper credit.

**Fritz, Byrne, Head & Gilstrap, PLLC**

221 West Sixth Street, Suite 960  
 Austin, TX 78701  
 Phone 512/476-2020 Fax 512/477-5267  
 www.fbhg.law

August 16, 2017

Freedom From Religion Foundation  
 c/o Richard L. Bolton  
 Boardman & Clark, LLP  
 1 S. Pinckney Street, Suite 410  
 P.O. Box 927  
 Madison, WI 53701-0927

Invoice# 110247 DHB  
 Our file# 062640 00001  
 Billing through 07/31/2017

Governor Greg Abbott

rbolton@boardmanclark.com

|                                                   |                   |
|---------------------------------------------------|-------------------|
| Balance forward as of invoice dated June 15, 2017 | \$6,130.50        |
| Payments received since last invoice              | 1,207.50          |
| Accounts receivable balance carried forward       | <u>\$4,923.00</u> |

PROFESSIONAL SERVICES

|          |     |                                               |          |                 |
|----------|-----|-----------------------------------------------|----------|-----------------|
| 06/06/17 | DHB | Review docket, memo to Richard re: [REDACTED] | 0.20 hrs | N/C             |
| 07/14/17 | DHB | Memo re: [REDACTED]                           | 0.20 hrs | N/C             |
| 07/27/17 | LCG | Review MSJ;                                   | 0.40 hrs | 150.00          |
|          |     |                                               |          | <u>\$150.00</u> |

FEE RECAP

|                            |          |            |                 |
|----------------------------|----------|------------|-----------------|
| Gilstrap, Lessie C.        | 0.40 hrs | 375.00 /hr | 150.00          |
| TOTAL FEES FOR THIS MATTER |          |            | <u>\$150.00</u> |

BILLING SUMMARY

|                                       |                          |
|---------------------------------------|--------------------------|
| Total professional services           | <u>\$150.00</u>          |
| Total of new charges for this invoice | <u>\$150.00</u>          |
| Plus net balance forward              | <u>\$4,923.00</u>        |
| <b>Total balance now due</b>          | <b><u>\$5,073.00</u></b> |

Payment due upon receipt. EIN: 742531698

062640 Freedom From Religion Foundati

Invoice# 110247 Page 2

Include invoice number on your check for proper credit.

**Fritz, Byrne, Head & Gilstrap, PLLC**

221 West Sixth Street, Suite 960  
 Austin, TX 78701  
 Phone 512/476-2020 Fax 512/477-5267  
 www.fbhg.law

November 15, 2017

Freedom From Religion Foundation  
 c/o Richard L. Bolton  
 Boardman & Clark, LLP  
 1 S. Pinckney Street, Suite 410  
 P.O. Box 927  
 Madison, WI 53701-0927

Invoice# 110891 DHB  
 Our file# 062640 00001  
 Billing through 10/31/2017

Governor Greg Abbott.

rbolton@boardmanclark.com

|                                                     |               |
|-----------------------------------------------------|---------------|
| Balance forward as of invoice dated August 16, 2017 | \$5,073.00    |
| Payments received since last invoice                | 5,073.00      |
| Accounts receivable balance carried forward         | <u>\$0.00</u> |

PROFESSIONAL SERVICES

|          |     |                                                                                |          |                 |
|----------|-----|--------------------------------------------------------------------------------|----------|-----------------|
| 10/13/17 | DHB | Review and analysis of SJ and protective order ruling; memo to Richard Bolton; | 0.30 hrs | 157.50          |
| 10/14/17 | DHB | Further review and analysis of decision; memo to [REDACTED]                    | 0.30 hrs | 157.50          |
| 10/16/17 | DHB | Research re: [REDACTED]                                                        | 0.20 hrs | N/C             |
| 10/18/17 | DHB | Memos to co-counsel re: [REDACTED]                                             | 0.20 hrs | 105.00          |
| 10/24/17 | DHB | Various memos re: [REDACTED]                                                   | 0.30 hrs | 157.50          |
| 10/26/17 | DHB | Various memos to co-counsel re: [REDACTED]                                     | 0.20 hrs | 105.00          |
|          |     |                                                                                |          | <u>\$682.50</u> |

FEE RECAP

|                            |          |            |                 |
|----------------------------|----------|------------|-----------------|
| Byrne, Dan                 | 1.30 hrs | 525.00 /hr | 682.50          |
| TOTAL FEES FOR THIS MATTER |          |            | <u>\$682.50</u> |

BILLING SUMMARY

062640 Freedom From Religion Foundati

Invoice# 110891

Page 2

|                                       |                        |
|---------------------------------------|------------------------|
| Total professional services           | \$682.50               |
| Total of new charges for this invoice | <u>\$682.50</u>        |
| <b>Total balance now due</b>          | <b><u>\$682.50</u></b> |

Payment due upon receipt. EIN: 742531698

Include invoice number on your check for proper credit.

**Fritz, Byrne, Head & Gilstrap, PLLC**

221 West Sixth Street, Suite 960  
 Austin, TX 78701  
 Phone 512/476-2020 Fax 512/477-5267  
 www.fbhg.law

March 13, 2018

Freedom From Religion Foundation  
 c/o Richard L. Bolton  
 Boardman & Clark, LLP  
 1 S. Pinckney Street, Suite 410  
 P.O. Box 927  
 Madison, WI 53701-0927

Invoice# 111765 DHB  
 Our file# 062640 00001  
 Billing through 02/28/2018

Governor Greg Abbott

rbolton@boardmanclark.com

|                                                       |               |
|-------------------------------------------------------|---------------|
| Balance forward as of invoice dated November 15, 2017 | \$682.50      |
| Payments received since last invoice                  | 682.50        |
| Accounts receivable balance carried forward           | <u>\$0.00</u> |

PROFESSIONAL SERVICES

|          |     |                                           |          |                 |
|----------|-----|-------------------------------------------|----------|-----------------|
| 12/13/17 | DHB | Various memos re: [REDACTED] (.3)         | 0.20 hrs | 105.00          |
| 12/19/17 | DHB | Memo to Richard Bolton; review materials; | 0.20 hrs | N/C             |
|          |     |                                           |          | <u>\$105.00</u> |

FEE RECAP

|                                   |          |            |                 |
|-----------------------------------|----------|------------|-----------------|
| Byrne, Dan                        | 0.20 hrs | 525.00 /hr | 105.00          |
| <b>TOTAL FEES FOR THIS MATTER</b> |          |            | <u>\$105.00</u> |

BILLING SUMMARY

|                                       |                        |
|---------------------------------------|------------------------|
| Total professional services           | <u>\$105.00</u>        |
| Total of new charges for this invoice | <u>\$105.00</u>        |
| <b>Total balance now due</b>          | <u><u>\$105.00</u></u> |

Payment due upon receipt. EIN: 742531698  
 Include invoice number on your check for proper credit.



**Fritz, Byrne, Head & Gilstrap, PLLC**

221 West Sixth Street, Suite 960  
 Austin, TX 78701  
 Phone 512/476-2020 Fax 512/477-5267  
 www.fbhg.law

June 8, 2018

Freedom From Religion Foundation  
 c/o Richard L. Bolton  
 Boardman & Clark, LLP  
 1 S. Pinckney Street, Suite 410  
 P.O. Box 927  
 Madison, WI 53701-0927

Invoice# 112394 DHB  
 Our file# 062640 00001  
 Billing through 05/31/2018

Governor Greg Abbott

rbolton@boardmanclark.com

|                                                    |               |
|----------------------------------------------------|---------------|
| Balance forward as of invoice dated March 13, 2018 | \$105.00      |
| Payments received since last invoice               | 105.00        |
| Accounts receivable balance carried forward        | <u>\$0.00</u> |

PROFESSIONAL SERVICES

|          |     |                                                                                                     |          |                 |
|----------|-----|-----------------------------------------------------------------------------------------------------|----------|-----------------|
| 03/14/18 | DHB | Memos to Richard Bolton re: [REDACTED]<br>[REDACTED] review motions to dismiss and<br>for judgment; | 0.30 hrs | 165.00          |
| 04/10/18 | DHB | Review Sparks denial order, follow up with<br>Richard Bolton;                                       | 0.20 hrs | 110.00          |
| 05/08/18 | DHB | Telephone conferences with Richard re: [REDACTED]                                                   | 0.20 hrs | N/C             |
| 05/09/18 | DHB | Telephone conferences, memos with Richard<br>Bolton, Aura Madren re: [REDACTED]<br>[REDACTED]       | 0.30 hrs | 165.00          |
|          |     |                                                                                                     |          | <u>\$440.00</u> |

FEE RECAP

|                            |          |            |                 |
|----------------------------|----------|------------|-----------------|
| Byrne, Dan                 | 0.80 hrs | 550.00 /hr | 440.00          |
| TOTAL FEES FOR THIS MATTER |          |            | <u>\$440.00</u> |

BILLING SUMMARY

|                                       |                 |
|---------------------------------------|-----------------|
| Total professional services           | <u>\$440.00</u> |
| Total of new charges for this invoice | \$440.00        |

062640 Freedom From Religion Foundati

Invoice# 112394 Page 2

**Total balance now due**

**\$440.00**

Payment due upon receipt. EIN: 742531698  
Include invoice number on your check for proper credit.